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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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MAR 29 2023
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CLERK, U.S. DISTRICT COURT

(1) Marci Marie Webber,
 (2) David Jason Ostrowski,
 * Et Al (Similarly Situated)
 (Enter above the full name of the plaintiff or plaintiffs in this action) Class Action

vs.

C: 1:23-cv-01975
 (I Judge Matthew F. Kennelly
 Magistrate Judge Jeffrey T. Gilbert
 PC 2
 RANDOM

State of Illinois,
Governor J.B. Pritzker,
Illinois Department
of Human Services, Grace
Hou, DuPage County
Courts, Daniel P. Christie, Chief Justice
 (Enter above the full name of ALL defendants in this action. Do not use "et al.") Error

CHECK ONE ONLY:

- ☒ COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)
- ☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE 28 SECTION 1331 U.S. Code (federal defendants)
- ☒ OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: Marci M. Webber & David Jason Ostronski
- B. List all aliases: _____
- C. Prisoner identification number: _____
- D. Place of present confinement: ⁽¹⁾ Chicago Read MHC & ⁽²⁾ Elgin MHC
- E. Address: 4200 N. Oak Park Av 750 S. State St.
Chicago, IL 60634 Elgin, IL 60123

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: J.B. Pritzker
Title: Governor
Place of Employment: State of Illinois
- B. Defendant: Grace Hon
Title: Director of Illinois Department of Human
Place of Employment: IDHS Services
(including OIG)
- C. Defendant: Judge Daniel P. Guerin
Title: Chief Justice
Place of Employment: DuPage County Courts

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 20 CV 7807 Webber v IDHS
& 21 CV 5444 Habeas Corpus (civil suit)
- B. Approximate date of filing lawsuit: 2021 12/30/2020
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Marci M Webber (only)
- D. List all defendants: 27 IDHS employees, currently being
streamlined by Carolina Sales, Esq.
See case # 20 CV 7807 before Judge Kness (originally
before Judge Charles Norgle)
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Cook Co, IL. Fed. Northern district
- F. Name of judge to whom case was assigned: Judge Kness &
Judge Charles Kacoras for the Habeas
- G. Basic claim made: 20 CV 7807: Mainly "deliberate indifference"
Some "Excessive Force" & other claims under § 1983
? conspiracy to commit these numerous harmful acts
Habeas is obvious, for my release as I was in 2019 or Discharge
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?):
- I. Approximate date of disposition: Revision is due 4/15/23

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Both Marci Webber and David Ostrowski are situated with hundreds of others ^{protected class} as NGR1 (Not Guilty by Reason of Insanity) ACQUITTEES and discriminated against by their arrest record and "Mental illness" label in facilities that violate their rights and laws, including criminal laws (i.e. threatening or using forced injections without cause, assaults by staff, damage of property, ^{perjury} and other punitive acts causing harm, some irreparable) while cases are dragged out for years, even decades as IDHS doctors and personnel ^(without disclosure of evidence from outside evaluations) refuse to allow access or document evidence helpful to the "patients"/NGR1 acquittees as State lawyers ignore Brady v. Maryland and use conspiratorial tactics with IDHS to obstruct ^{falsely imprison} IDHS/personnel ^{State/County} refuse to provide a fair, expedient system to return NGR1's to the community once they are no longer "Mentally ill and dangerous" from that mental illness ^{that caused the instant offense} in accordance with federal law by baiting, provoking ^{abusing}, using psychotic "patients" by suggestion to target others, then lying, exaggerating ^{misleading the court} and making counterintuitive,

Contra indicated, dishonest recommendations to keep the NGR1 trapped in a retaliatory, coercive, totalistic, dishonest and ^(government) abusive environment that is not "least restrictive" or "reasonably calculated to significantly improve" "patient"/prisoners which uses normal reactions to this ^(using FBI and positive methods) abusive ^(negative) to pathologize (build cases for "mental illness" vs. the standard of care of ruling out "mental illness") and violate liberty rights including a discharge vs. more "steps" ^(in government programming not there now) that are unconstitutional, harmful and keep NGR1's from contributing to the tax base as viable citizens instead of depleting the tax base by over \$1,000/day ^{per person} inpatient or in more tax depleting programs by falsifying information using state lawyers to a court of law ^{that adds to it}. After release, everyone has conditions for "five years" ^{no matter the merits or offense} when prisoners ^{convicts} with the worst crimes such as murder are paroled for "three years". NGR1's are treated so badly ^{in all directions that} it can be argued as a form of slavery (i.e. "Liberation by Oppression: A Comparative Study of Slavery and Psychiatry" by Dr. Thomas Szasz) due to the profiting, job-making and complete helplessness of citizens who can't even get other agencies to help them due to a pervasive, discriminatory attitude/culture that is cruel, dishonest and covers up this illegal

We will need a attorney to ⁵ fine tune the numerous allegations ^{Revised 9/2007} of acquittes for societal convenience based on stereotyping not fact. ^{"Alternative Sentencing"} that are unconstitutional and discriminator

Please ~~copy~~^{may} US copies
because it is virtually
impossible in this
Obstruction

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

To order IDHS & State lawyers to adhere to the principles of Brady v Maryland in NGR1 cases, treat us like involuntary committed with expeditious procedures including discharges vs. 5 years of conditions using counter intuitive/contraindicated recommendations that curtail liberty and choice in what is an illegal "Alternative Sentence" & order accountability for crimes including perjury - Make it fair, Constitutional & healing & Damages (monetary)

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 8th day of March, 2023

(1) Marc M. Webber

(2) David Ostrowski

(Signature of plaintiff or plaintiffs)

(1) Marc M. Webber

(2) David Jason Ostrowski

(Print name)

(I.D. Number)

(1) 4200 N. Oak Park Av. Chicago, IL 60634

(2) 750 S. State St. Elgin, IL 60123

(Address)



Illinois Department of Human Services

Elgin Mental Health Center

750 S State Street

Elgin IL 60123-7692

WCS 11366 (R-11-17)

Druid Ostraski 789267



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Office of Clerk of the U.S. District Court
United States Court House
219 South Dearborn Street
Chicago, IL 60604

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